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nextSource, Inc.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO COURTHOUSE

DEMETRIC DI-AZ, OWEN DIAZ and  
LAMAR PATTERSON,

Plaintiffs,

vs.

TESLA, INC. DBA TESLA MOTORS, INC.;  
CITISTAFF SOLUTIONS, INC.; WEST  
VALLEY STAFFING GROUP;  
CHARTWELL STAFFING SERVICES,  
INC.; NEXTSOURCE, INC.,

Defendants.

Case No. 3:17-cv-06748-WHO  
*[Removed from Alameda Superior Court,  
Case No. RG17878854]*

**DECLARATION OF JUAN ARANEDA IN  
SUPPORT OF DEFENDANT  
NEXTSOURCE, INC.'S  
ADMINISTRATIVE MOTION TO FILE  
DOCUMENTS UNDER SEAL**

Amended Complaint Filed: December 26, 2018

**DECLARATION OF JUAN C. ARANEDA**

I, **JUAN C. ARANEDA**, declare as follows:

1. I am an attorney with the law firm of Fisher & Phillips LLP, attorneys of record for Defendant nextSource, Inc. (“Defendant”) in this action. I am duly licensed to practice law in the State of California and before the United States District Court for the Northern District of California. I have personal knowledge of the facts stated in this declaration and, if called as a witness, could competently testify to these facts.

2. Attached to Exhibit B of my declaration in support of nextSource, Inc.’s Motion for Summary Judgment or, in the Alternative, Summary Adjudication of Issues are true and correct copies of documents marked as Exhibits 91 and 178 to the Deposition of Kevin McGinn. These exhibits were produced in discovery and bates stamped CITISTAFF-0000006-CITISTAFF-0000007 and NS000025. Defendants Citistaff Solutions, Inc. and nextSource, Inc. marked these documents as “confidential” pursuant to the Protective Order, and the documents should therefore be sealed pursuant to this Order.

3. Attached to Exhibit C of my declaration in support of nextSource, Inc.’s Motion for Summary Judgment or, in the Alternative, Summary Adjudication of Issues are true and correct copies of documents marked as Exhibits 124, 125, 127, 130, 132, 134, 136, 140, and 142 to the Deposition of Wayne Jackson. These exhibits were produced in discovery and bates stamped TESLA-0000635-TESLA-0000636, TESLA-0000634, TELS-0000646-TESLA-0000647, TESLA-0000004-TESLA-0000008, TESLA-0000730-TESLA-0000737, TESLA-0000317, TESLA-0000320, CITISTAFF-0000009-CITISTAFF-0000010, and TESLA-0000752-TESLA-0000753. Defendants Tesla, Inc. and Citistaff Solutions, Inc. marked these documents as “confidential” pursuant to the Protective Order, and the documents should therefore be sealed pursuant to this Order.

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4. Attached to Exhibit D of my declaration in support of nextSource, Inc.'s Motion for Summary Judgment or, in the Alternative, Summary Adjudication of Issues are true and correct copies of documents marked as Exhibits 1, 3, 14, and 15 to Vol. I of the Deposition of Owen Diaz. These exhibits were produced in discovery and bates stamped CITISTAFF-00000034-CITISTAFF-0000035, TESLA-0000005-TESLA-0000008, and CITISTAFF-0000050-CITISTAFF-0000055. Defendants Citistaff Solutions, Inc. and Tesla, Inc. marked these documents as "confidential" pursuant to the Protective Order, and the documents should therefore be sealed pursuant to this Order.

5. Attached to Exhibit E of my declaration in support of nextSource, Inc.'s Motion for Summary Judgment or, in the Alternative, Summary Adjudication of Issues are true and correct copy of a document marked as Exhibit 33 to Vol. II of the Deposition of Owen Diaz. This exhibit was produced in discovery and bates stamped CITISTAFF-0000043-CITISTAFF-0000045. Defendant Citistaff Solutions, Inc. marked this document as "confidential" pursuant to the Protective Order, and the document should therefore be sealed pursuant to this Order.

5. Attached to Exhibit G of my declaration in support of nextSource, Inc.'s Motion for Summary Judgment or, in the Alternative, Summary Adjudication of Issues are true and correct copy of a document marked as Exhibit 88 to the Deposition of Monica DeLeon. This exhibit was produced in discovery and bates stamped CITISTAFF-0000001-CITISTAFF-0000003. Defendant Citistaff Solutions, Inc. marked this document as "confidential" pursuant to the Protective Order, and the document should therefore be sealed pursuant to this Order.

6. Attached to Exhibit I of my declaration in support of nextSource, Inc.'s Motion for Summary Judgment or, in the Alternative, Summary Adjudication of Issues are true and correct copies of documents marked as Exhibits 43, 53, 55, 56, and 64 to the Deposition of Edward Romero. These exhibits were produced in discovery and bates stamped TESLA-0000511, TESLA-0000308, TESLA-0000641, TESLA-0000135-TESLA-0000136, and CITISTAFF-0000011-CITISTAFF-0000013. Defendants Tesla, Inc. and Citistaff Solutions, Inc. marked these documents as "confidential" pursuant to the Protective Order, and the documents should therefore be sealed pursuant to this Order.

1 I declare under penalty of perjury under the laws of the State of California and the United  
2 States of America that the foregoing is true and correct. Executed this 29<sup>th</sup> day of October 2019  
3 in San Francisco, California.

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5 /s/ Juan C. Araneda

JUAN C. ARANEDA  
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